

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

FUN VALLEY PARK INC.

DEBTOR

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CASE NO. 10-08563 (BKT)

CHAPTER 11

**DEBTOR'S MOTION IN COMPLIANCE TO
ORDER TO SHOW CAUSE**

TO THE HONORABLE COURT:

COMES NOW, Debtor, through the undersigned attorney, who respectfully states and prays as follows:

1. Debtor filed this petition for relief under Chapter 11 of the Bankruptcy Code on September 16, 2010.
2. On May 18, 2011, this Honorable Court ordered Debtor to show cause as to reasons why the Disclosure Statement and Plan of Reorganization in this case was not filed within the period granted by the Court, which was on or before January 15, 2011, this pursuant to the minute of hearing of November 17, 2010. Failure to comply with this order may cause that the Court convert or dismiss the above-captioned case (Docket # 57).
3. On January 14, 2011, Debtor filed a motion requesting extension of time of forty-five (45) days to file the Disclosure Statement and Plan of Reorganization. This Honorable Court granted this motion on January 19, 2011 (Dockets #27 & 28).
4. In addition, on March 1, 2011, a second extension time motion of thirty (30) days to file the Disclosure Statement and Plan of Reorganization was filed by Debtor, which was granted by

this Honorable Court on March 2, 2011 (Dockets #18 & 49).

5. Finally, on April 1, 2011, Debtor filed a third and final motion requesting extension of time twenty (20) days to file the Disclosure Statement and Plan of Reorganization. On same date, the Court granted this motion (Dockets #52 & 53)

6. In compliance with this Order, Debtor respectfully states and prays as follows.

REPLY TO ORDER TO SHOW CAUSE

7. Upon the filing of the instant petition, Debtor has been negotiating with the major creditor of this case, which is Banco de Desarrollo Económico para Puerto Rico, in an effort to reach an amicable understanding regarding its claims.

8. Notwithstanding the aforementioned, on this same date, Debtor has filed its Disclosure Statement and Plan of Reorganization before this Honorable Court.

9. As such, Debtor is interested and ready to continue with this reorganization process and intends to keep working with this case in the best interest of all creditors and the estate.

WHEREFORE, Debtor prays this Honorable Court to take notice of these matters and to enter order as follows:

- a) To deem complied the Order to Show Cause dated May 18, 2011,
- b) To allow the continuation of this case as a Chapter 11 proceeding.
- c) To schedule an Approval Hearing, or grant any further relief as deemed appropriate.

I HEREBY CERTIFY: That on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the participants appearing in said record.

I HEREBY CERTIFY: That on this same date a copy of the foregoing motion has been send by regular mail to all parties as identified in the master address list.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 25th of May 2011.

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Case 10-08563-BKT11
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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